IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CRIMINAL NO. MJM-23-411

ADANEGBE GIFT OSEMWENKHAE,
EMILY GIL ARIAS,
LAKEISHA PARKER,
MARTIN OGISI,
BLONDEL NDJOUANDJOUAKA,
KEVIN COLON,
LORENA PEREZ HERRERA,

Defendants.

MOTION FOR THE COURT TO SET CERTAIN PRETRIAL DEADLINES

The United States of America, by and through its undersigned counsel, hereby moves the Court for an Order setting a deadline for the filing of pretrial motions, a briefing schedule, and a motions hearing in the above-referenced matter as to the above-listed defendants. In support of this motion, the government states as follows:

- 1. On or about February 7, 2024, defendants Adanegbe Gift Osemwenkhae, Emily Gil Arias, Fatoumata Boiro, Lakeisha Parker, Martin Ogisi, Blondel Ndjouandjouaka, Kevin Colon, and Lorena Perez Herrera had their initial appearances on a pending indictment alleging multiple criminal offenses, including conspiracy to commit money laundering and substantive money laundering counts, in violation of 18 U.S.C. § 1956.
- 2. To date, the government has produced extensive discovery to the defendants. The government submits that it is appropriate to set a deadline for the filing of pretrial motions, a briefing schedule, and a pretrial motions hearing.
- 3. The government suggests that the Court set a motions deadline of on or about December 5, 2024, with time thereafter for oppositions by the government, and replies by the

defendants, and a motions hearing in 2025.

4. Mr. Gorokhov, counsel for Adanegbe Gift Osemwenkhae, advised that he has no objection to the motion.

- 5. Mr. Waechter, counsel for Emily Arias, advised that he has no objection to the motion.
- 6. Mr. Rafter, counsel for Lakeisha Parker, advised that he consents to the requested motion, but is requesting that the government not respond to any motions he files and asks to reserve the right to file additional motions in January 2025.
- 7. Mr. Madiou, counsel for Martin Ogisi, advised that he has no objection to the motion.
- 8. Ms. Reamy, counsel for Blondel Ndjouandjouaka, advised that she has no objection to the motion.
- 9. Mr. Bardos, counsel for Kevin Colon, advised that he has no objection to the motion.
- 10. Mr. Hall, counsel for Lorena Perez Herrera, has not yet responded to the government's inquiry regarding his position on the motion.
 - 11. A proposed Order is attached for the Court's consideration.

Respectfully submitted,

Erek L. Barron
United States Attorney

/s/

Harry M. Gruber Jared Beim Assistant United States Attorneys 36 S. Charles Street, 4th Floor Baltimore, Maryland 21201-2692 (410) 209-4800

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing government's filing was served via ECF on the defendants' counsel.

__/s/____

Harry M. Gruber Assistant United States Attorney